

REMARKS/ARGUMENTS

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claim 16 has been cancelled and the subject matter thereof has been added to claim 11. Claims 17 and 18 have also amended hereby to correct potential problems with antecedent basis. Claims 11-15 and 17-21 are pending for further examination. Applicant believes the new claims to be distinguishable from the prior art of record for at least the following reasons.

Claims 11-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sampat et al (5,557,724) in view of Knowles (5,481,509) and Hoarty (5,319,455).

Claim 11 contains features that are not present in the prior art of record. For example, claim 11 recites, *inter alia*, “a software update routine ... to update at least operating software of the audiovisual reproduction apparatus, by connecting to the at least one remote server and downloading an update.” Applicant submits that the applied references are silent on the concept of “a software update routine to ... update at least operating software of the audiovisual reproduction apparatus, by connecting to the at least one remote server and downloading an update.” For example, while Hoarty discloses updating a database, the data stored in this database does not relate to operating software.

Further, the Office Action concedes that Knowles, Sampat and Hoarty do not teach or suggest an LCD display and uses Official Notice that LCD's are well known in the art. Applicant traverses this notice and requests that the Examiner provide some

evidence that LCDs are well known in the art in the context of the preset invention.

Applicant notes that not once, in all three references used to allegedly render obvious Applicant's claims, are LCDs ever mentioned, let alone taught to be part of the devices disclosed therein.

For at least these reasons, Applicant submits that claim 11 is allowable over the prior art of record. Claims 12-15 and 17-21 should be allowable based at least on their dependency from allowable claim 11.

For at least the reasons presented herein, Applicant submits that claims 11-15 and 17-21 are patentable over the applied references. Thus, in view of the above, reconsideration and withdrawal of the rejection are respectfully requested.

Respectfully submitted,

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